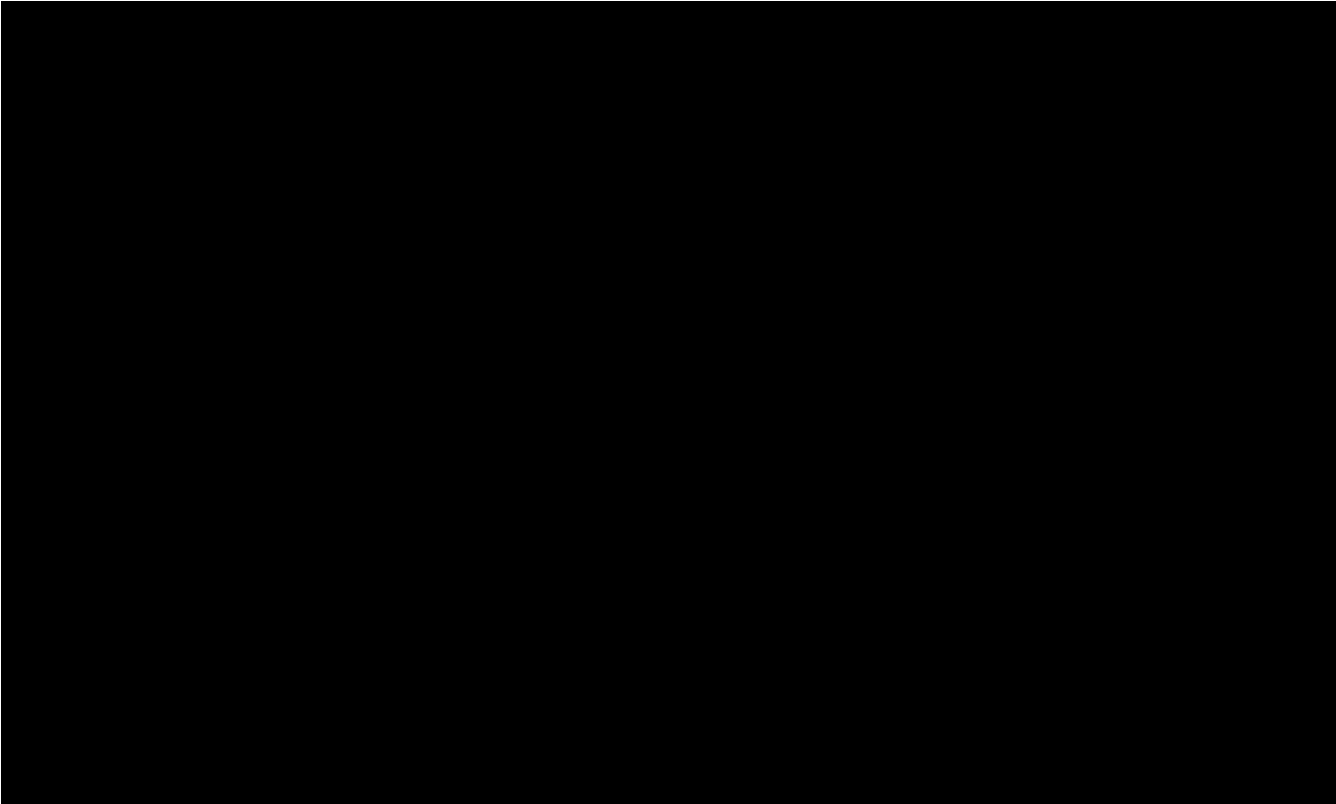


# EXHIBIT F



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**From:** McLeod, Dina (USANYS) <Dina.McLeod@usdoj.gov>  
**Sent:** Friday, September 6, 2024 5:02 PM  
**To:** Alexandria Swette <Alexandria.Swette@kobrekim.com>  
**Cc:** Sean S. Buckley <Sean.Buckley@kobrekim.com>; Victoria R. Fordin <Victoria.Fordin@kobrekim.com>; samuelnitze@quinnemanuel.com; ericaperdomo@quinnemanuel.com; Noam Cooper Katz <Noam.Katz@kobrekim.com>; Bhaskaran, Rushmi (USANYS) <Rushmi.Bhaskaran@usdoj.gov>; Kostopoulos, Georgia (USANYS) <Georgia.Kostopoulos@usdoj.gov>; Chiuchiolo, Nicholas (USANYS) <Nicholas.Chiuchiolo@usdoj.gov>  
**Subject:** [EXTERNAL] RE: 23 Cr. 251 (AKH)

Alex,

Please see the below responses to your questions.

1. The method by which JPMC collected Frank's Google Analytics data, including any vendors or individuals at JPMC who participate in the collection and preservation of Frank's Google Analytics data.
  - **EY, acting at the direction of counsel, completed a forensic collection of the GA data.**
2. The dates on which JPMC collected the Google Analytics data and documents recently produced to SDNY.
  - **EY collected the data in June/July 2024.**

3. Whether the Government or JPMC maintains a local copy of Frank's Google Analytics dashboard.

- **It is a little unclear what you mean by a "local copy" of a "Google Analytics dashboard." JPMC has the data that was produced to the Government in the same form as it was produced to the Government (and then to the defendants). The Government has the data only in the form that was produced by JPMC.**

4. Whether the Frank Google Analytics dashboard was accessed through an *administrator's* account or an *individual's* account.

A. **EY collected the data through administrator accounts.**

5. Whether JPMC retains access to individual Google Analytics user accounts.

A. **JPMC no longer has access to the Google Analytics accounts. Google recently discontinued its Universal Analytics feature and no longer maintains historical data for this platform.**

B. It is our understanding that certain Google Analytics data is stored at the *user* level and may not be viewable through an *administrative* export. Please identify all individual users who had access to Google Analytics for Frank and produce the user level account data (including any annotations) associated with any of those accounts, including:

- i. **Previously available detail on individual Google Analytics accounts were included in the production to the defendants (JPMC 01206416 – 06446).**

Best,

Dina McLeod  
Co-Chief, Complex Frauds and Cybercrime Unit  
United States Attorney's Office  
Southern District of New York  
Tel: (212) 637-1040  
[Dina.McLeod@usdoj.gov](mailto:Dina.McLeod@usdoj.gov)

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**From:** Alexandria Swette <[Alexandria.Swette@kobrekim.com](mailto:Alexandria.Swette@kobrekim.com)>

**Sent:** Wednesday, September 4, 2024 6:51 PM

**To:** McLeod, Dina (USANYS) <[DMcLeod@usa.doj.gov](mailto:DMcLeod@usa.doj.gov)>; Chiuchiolo, Nicholas (USANYS) <[NChiuchiolo@usa.doj.gov](mailto:NChiuchiolo@usa.doj.gov)>

**Cc:** Sean S. Buckley <[Sean.Buckley@kobrekim.com](mailto:Sean.Buckley@kobrekim.com)>; Victoria R. Fordin <[Victoria.Fordin@kobrekim.com](mailto:Victoria.Fordin@kobrekim.com)>; [samuelnitze@quinnemanuel.com](mailto:samuelnitze@quinnemanuel.com); [ericaperdomo@quinnemanuel.com](mailto:ericaperdomo@quinnemanuel.com); Noam Cooper Katz <[Noam.Katz@kobrekim.com](mailto:Noam.Katz@kobrekim.com)>

**Subject:** [EXTERNAL] 23 Cr. 251 (AKH)

Dina,

We write to follow up on your recent Rule 16 production of Google Analytics data from J.P. Morgan Chase. We have conferred with counsel for the Bank, who directed us to the Government for further clarification. Could you please confirm the following:

1. The method by which JPMC collected Frank's Google Analytics data, including any vendors or individuals at JPMC who participate in the collection and preservation of Frank's Google Analytics data.
2. The dates on which JPMC collected the Google Analytics data and documents recently produced to SDNY.
3. Whether the Government or JPMC maintains a local copy of Frank's Google Analytics dashboard.
4. Whether the Frank Google Analytics dashboard was accessed through an *administrator's* account or an *individual's* account.
5. Whether JPMC retains access to individual Google Analytics user accounts.
  - A. It is our understanding that certain Google Analytics data is stored at the *user* level and may not be viewable through an *administrative* export. Please identify all individual users who had access to Google Analytics for Frank and produce the user level account data (including any annotations) associated with any of those accounts, including:
    - i. Olivier Amar
    - ii. Jen Wong
    - iii. Bonnie Stefanick

We are available to meet and confer regarding the above questions at your earliest convenience.

Thanks,  
Alex

Alexandria Swette  
+1 212 488 4917



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**APAC** (Hong Kong, Seoul, Shanghai), **Caribbean** (BVI, Cayman Islands), **EMEA** (Cyprus, Dubai, London, Tel Aviv)

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